

VIRGINIA:

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ANDREA TORRES LOPEZ,

Plaintiff,

v.

Civil Action No.: 3:23-cv-205

ABDULLAHI MOALIM,

and

**ALI BORE dba BORE TRANSPORT
and dba BORE TRANSPORT, INC.,**

Defendants.

COMPLAINT

TO THE HONORABLE JUDGES
OF THE AFORESAID COURT:

COMES NOW, Andrea Torres Lopez, by counsel, and moves this Honorable Court for a Judgment and Award of Execution against the defendants, Abdullahi Moalim and Ali Bore, jointly and severally, in the sum of SEVEN HUNDRED FIFTY THOUSAND DOLLARS (\$750,000.00), representing compensatory damages for the following reasons, to-wit:

1. Plaintiff Andrea Lopez Torres is an individual who resides in Chester, Virginia.
2. Defendant Abdullahi Moalim is an individual who resides in Charlotte, North Carolina.

3. Defendant Ali Bore is an individual who resides in Charlotte, North Carolina.

4. This Court has subject matter jurisdiction over this suit pursuant to 28 U.S.C. § 1332(a) as there exists complete diversity of citizenship between the Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

5. This Court has personal jurisdiction over the Defendants pursuant to Va. Code § 8.01-328.1 et seq. because they transact business in Virginia and caused tortious injury to the plaintiff as a result of negligent acts in Virginia.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because the harms suffered by Plaintiff occurred in the Eastern District of Virginia and because all Defendants are subject to personal jurisdiction in this District.

7. That on or about Monday, September 30, 2019, at approximately 8:45 a.m., the plaintiff, Andrea Torres Lopez, was the driver of a 2018 Toyota Corolla, traveling in a southerly direction on Interstate 95, at or near its intersection with Ruffin Road, in the City of Richmond.

8. That at the same date and time the defendant Abdullahi Moalim was operating a 2007 Freightliner Tractor Trailer in a southerly direction on Interstate 95 at or near its intersection with Ruffin Road, in the City of Richmond.

9. That at the same time, place, and date, defendant Abdullahi Moalim was operating his vehicle at the request and benefit for the defendant Ali Bore; as agent and employee for defendant Ali Bore; by and with defendant Ali Bore's permission and

within the scope of defendant Abdullahi Moalim's authority and employment with defendant Ali Bore.

10. That the defendant, Abdullahi Moalim operated his vehicle in a careless, reckless, and negligent manner, so as to cause a collision between his vehicle and the plaintiff's vehicle, thereby injuring the plaintiff.

11. At all times pertinent hereto, defendant Ali Bore operated businesses called "Bore Transport" and "Bore Transport, Inc." Bore operated both businesses as sole proprietorships.

12. At the time of the September 30, 2019 motor vehicle collision between plaintiff and defendant, defendant Moalim, as agent and employee of defendant Ali Bore, was operating the 2007 Freightliner pursuant to defendant Bore's business activities as Bore Transport and/or Bore Transport, Inc.

13. That by reason of and as a direct and proximate result of which the plaintiff received severe and permanent injuries, has undergone great physical pain and anguish, medical expenses, lost wages and in the future will be caused to suffer great physical pain, medical expense, lost wages and anguish.

14. That by reason of and as a direct and proximate result of which the plaintiff has sustained damages in the extent of SEVEN HUNDRED FIFTY THOUSAND DOLLARS (\$750,000.00).

WHEREFORE, the plaintiff prays that she be granted a judgment against the defendants, Abdullahi Moalim and Ali Bore, jointly and severally, in the sum of SEVEN HUNDRED FIFTY THOUSAND DOLLARS (\$750,000.00), representing compensatory

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damages for the negligence aforesaid and costs in this behalf expended and interest
from the date of the cause of action.

A TRIAL BY JURY IS DEMANDED.

ANDREA TORRES LOPEZ

By /s/ John R. Newby
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